IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE

SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC.,	§ §
Plaintiffs,	§ §
V.	§ § §
Broadcom Inc. Brocade Communications Systems LLC Extreme Networks, Inc.	§ Jury Trial Demanded § § §
Defendants.	§

MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Comes now Plaintiff SNMP Research, Inc. by and through counsel, and pursuant to Fed. R. Civ. P. 5.2 and Local Rule 26.2(b) of this Court, and this Court's Memorandum and Order Regarding Sealing Confidential Information [Doc. 11], seeks leave of this Court to submit certain documents under seal and/or in redacted form as indicated below.

Plaintiff moves for leave to file a portion of its Motion to Compel Discovery, Enforce Order Compelling Discovery, Determine Sufficiency of Request for Admission Responses, And For Sanctions As To Defendants Broadcom Inc. and Brocade Communications Systems LLC ("Motion to Compel"), which contains text the Defendants have designated confidential.

Plaintiff moves for leave to file Exhibits A, C, K, L, M, P, and Q to the Declaration of Olivia Weber in Support of Plaintiff's Motion to Compel ("Weber Declaration") under seal because Defendants designated those documents confidential or highly confidential.

Because Defendants have marked the items specified above confidential or highly confidential, Plaintiff presents this Motion to the Court without a position on whether the documents should be filed under seal.

As required by the Memorandum and Order Regarding Sealing Confidential Information, the unredacted versions of the documents referenced herein are provided as exhibits to this Motion and since only a portion of the Motion to Compel is redacted, that portion of the Motion to Compel is highlighted.

Respectfully submitted this 19th day of July, 2022.

/s/ John L. Wood_

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